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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 18-577 CRB
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED] ORDER
	)	
v.	)	
	)	
MICHAEL RICHARD LYNCH AND	)	
STEPHEN KEITH CHAMBERLAIN,	)	
	)	
Defendants.	)	

**STIPULATION**

The parties, through their respective counsel, stipulate and agree that the existing protective order (Dkt. 54) shall apply to Defendant Lynch, his attorneys, and members of his defense team. The parties further stipulate and agree that attorneys for Defendant Chamberlain may share documents received from the government in this matter with attorneys for Defendant Lynch, and vice versa, and that such documents shall be treated consistent with the existing protective order. The parties respectfully request that the Court issue an order to this effect.

IT IS SO STIPULATED.

1 DATED: June 16, 2023

THOMAS A. COLTHURST  
Attorney for the United States Attorney  
Acting Under Authority Conferred by  
28 U.S.C. § 515

4 *Robert S. Leach*

5 By: \_\_\_\_\_

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ADAM A. REEVES  
Assistant United States Attorneys

8 DATED: June 16, 2023

STEPTOE & JOHNSON LLP

11 By: /s/ \_\_\_\_\_

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16 DATED: June 16, 2023

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CELESTE KOELEVELD  
DANIEL SILVER  
Attorneys for Defendant  
Michael Richard Lynch



**[PROPOSED] ORDER**

Pursuant to stipulation and good cause shown, the Court ORDERS that the existing protective order (Dkt. 54) shall apply to Defendant Lynch, his attorneys, and members of his defense team. Attorneys for Defendant Chamberlain may share documents received from the government in this matter with attorneys for Defendant Lynch, and vice versa. Such documents shall be treated consistent with the existing protective order.

IT IS SO ORDERED.

Date:

\_\_\_\_\_  
THE HONORABLE CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE